

REMARKS

Applicants acknowledge receipt of the Office Action dated February 24, 2009.

Claims 27-49 are pending in the application.

Claims 27, 30, 31 and 41 stand rejected.

Claims 28, 29, 32-40 and 42-49 have been objected to.

Claim 50 is new.

Allowable Subject Matter

Claims 28-29, 32-40 and 42-49 stand objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form, including all of the limitations of the base claim and any intervening claims. Applicants acknowledge the indication of allowable subject matter and have created dependent claim 50 in response to the indication of allowable subject matter. For the reasons discussed below, however, Applicants respectfully elect to traverse the current rejection while reserving the right to amend at a later date.

Rejection of Claims Under 35 U.S.C. § 102

Claims 27, 30-31 and 41 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,640,244 to Bowman-Amuah (*Bowman*). Applicants respectfully traverse this rejection. While not conceding that the cited reference qualifies as prior art, but instead to expedite prosecution, Applicants have chosen to respectfully disagree and traverse the rejection as follows. Applicants reserve the right, for example, in a continuing application, to establish that the cited reference, or other references cited

now or hereafter, do not qualify as prior art as to an invention embodiment previously, currently, or subsequently claimed.

As will be appreciated, “[a] ... claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegall Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicants respectfully submit that this burden has not been met by the instant Office Action, because, as will be shown below, independent Claim 27 recites at least one limitation that is not disclosed, either directly or under the principles of inherency, in *Bowman*.

As an initial matter, *Bowman* differs from the present invention in scope and purpose. These differences in scope and purpose are reflected in a comparison Applicants’ Claim 27 and the abstract of *Bowman*. Claim 27 recites:

A computer program product, comprising:
a data structure, wherein
 said data structure comprises an order processing system,
 said order processing system comprises a complex object,
 said complex object comprises a service profile,
 the service profile represents a complex asset, and
 said complex asset is associated with an account;
a data manager configured to:
 receive at least a portion of the service profile from an external
 server via an information network, and
 generate a business object based on the portion of the service
 profile;
a transformation engine configured to generate at least a portion of the complex
 object based on the business object, wherein the complex object is stored
 in an asset table; and
computer readable storage media, wherein said data structure, said data manager,
 and said transformation engine are encoded in said computer readable
 storage media.

Claim 27. By contrast, *Bowman* teaches:

A system and method are provided for batching logical requests for reducing network traffic. A group of business objects necessary for a transaction are provided and managed in a logical unit of work. Logically-related requests received from the logical unit of work are grouped into a first single network message, and update and retrieval transactions are grouped into a second single network message. The first and second messages are stored, and the first message is sent upon receiving an order to send the first message and the second message is sent upon receiving an order to send the second message.

See Bowman, Abstract. *Bowman* describes a batch controller for reducing network traffic, which groups received transactions into a single network message. By contrast, the claimed invention, as reflected in Claim 27, is, for example, directed to a computer program product for an order processing system, which comprises a complex object, a data manager for receiving a portion of a service profile from an external server, and a transformation engine. These limitations, which (among other such limitations) are directed to specific elements that are not present in *Bowman*, are articulated, for example, in Applicants' Claim 27 and serve as evidence of the inability of *Bowman* to anticipate the claimed invention.

In this regard, the Office Action fails to demonstrate (or even to legitimately allege) that *Bowman* discloses that the claimed "complex asset is associated with an account" as recited in independent Claim 27, for example. The Office Action laconically points to *Bowman* as teaching "a complex asset is associated with an account (Fig. 32, 'order report writer')." Office Action, page 3. It is not clear from the text of the Office Action whether the Office Action intends the cited "order report writer" to map to the recited account or to the recited complex asset. Given that *Bowman*'s "order report writer" cannot successfully be equated to either, the forgoing question is difficult to

answer. Nevertheless, without regard to whether the Office Action intends the cited ‘order report writer’ to map to the recited account or to the recited complex asset, the mapping proposed by the Office Action with respect to the recited limitation that the “complex asset is associated with an account” is defective for at least two reasons.

First, two items (*i.e.*, the complex asset and the account) are recited in Claim 27 as both existing and having a specific a relationship between them (being associated). That the Office Action points to only one entity as teaching both recited elements and their relationship indicates that the Office Action has failed meet its burden to allege the presence of either one or the other, and that the recited relationship is not present in *Bowman*. Further, Applicants respectfully submit that Fig. 32 does not contain an “order report writer.” While Fig. 31 depicts a label entitled “order report writer,” the phrase “order report writer” is not used in the text of *Bowman*, and no association is shown in *Bowman* between the cited “order report writer” and either a complex asset or an account. Like the phrase, “order report writer,” the phrase “complex asset” is not used in the (312 columns of) text of *Bowman*. Similarly, the word “account” is not used in the description of Fig. 31 (quoted below), further militating against the notion that an account is associated with anything in Fig. 31. Given that *Bowman* does not teach (or even more generally suggest) an account, a complex asset, or, more specifically the recited limitation that the claimed “complex asset is associated with an account,” Applicants respectfully submit that *Bowman* does not anticipate Claim 27.

Further, the Office Action fails to establish that *Bowman* teaches the recited “order processing system [that] comprises a complex object.” As an initial matter, the Office Action tersely notes that “said order processing system comprises a complex object said complex object comprises a service profile, the service profile represents a

complex asset (Fig. 31, 3102, Bowman).” Office Action, p.3. It is not clear from this text whether the Office Action intends to map Report Writer Process 3102 to the recited complex object, service profile, order processing system or complex asset.

Both clarity with respect to the Office Action’s alleged mapping of a complex object and contradiction of the notion that *Bowman* teaches an “order processing system [that] comprises a complex object” are provided together in the context of the Office Action’s discussion of the recited transformation engine. *See* Office Action, p.3. Specifically, the Office Action maps the complex object to a report status when noting the existence of “a transformation engine configured to generate at least a portion of the complex object based on the business object, wherein the complex object is stored in an asset table. (Fig. 31, ‘report status table’, Bowman)” Office Action, p.3. While it is not entirely clear from the text of the Office Action whether the Office Action intends to map the recited transformation engine, the recited complex object, or the recited asset table to the report status table of *Bowman*, the portions of *Bowman* describing Figure 31 lead Applicants to conclude that the Office Action intends to allege that Figure 31 shows an asset table (report status table) containing the complex object (report status). The associated text states:

FIG. 31 describes the relationships between the major components of the report process 3100 and the report writer process 3102.

Design Approach

For the report process in a client/server system, a set of APIs is provided for use within application programs and within the application report writer modules. Each API requests a specific report service (generation, printing, or deletion) which is performed by a report manager module.

The report process maintains an internal database table, a report status table, containing information about each report that has been

requested for generation, including: Requester ID Report name Date/time requested Status (requested, in process, complete, or error) Report-specific parameters.

The requester ID, report name, and date/time are used to uniquely identify the report. These values are passed to APIs which request report status, print or delete a previously generated report.

All application-defined report writer modules invoke an API to update the report status table with a status of "completed" after a report has been produced or with "error" if the report cannot be generated. An API is also provided to print the report after the generation if specified in the original request.

Processed report records are removed from the table only after the output reports have been archived. Implementation and frequency of this table cleanup is to be determined in systems management design.

Report Process Flows

Report processing is message-driven. Each defined API sends a unique message to the report process. The report process reads the messages from a queue and invokes the appropriate modules to handle each request. Subsequent process flows differ based upon the requested service. In the case of a report generation request, the process flow proceeds as follows: A record is added to the report status table. A message is sent to the report writer process for immediate generation or to the event manager for generation at a specified time (report scheduling). The appropriate application report writer module generates the report, prints it if specified in the original API request, and updates the status in the report status table.

A request to print a report proceeds as follows: The report status is retrieved from the report status table. The output file is located on disk and sent to the specified or default printer or the request is sent to the event manager for report scheduling.

Report deletion proceeds as follows: The report record is removed from the report status table. The report file is removed from disk.

Status information requests are performed directly from the API using Information Access Services APIs. No interaction with the report process is necessary, which results in improved performance.

Modules

See *Bowman*, Col. 11, l. 50-Col. 12, line 43. Assuming that the Office Action intends to map the recited “asset table” to the report status table, it follows that the Office Action intends to map “report status” to the recited complex object.

Even importing this definition of “complex object” from the “transformation engine” limitation into the taciturn mapping provided for the recited “order processing system,” it is not entirely clear whether the Office Action intends the order processing system to map to report writer process 3102 or to one of the components of report writer process 3102. It is not relevant, however, whether the Office Action intends to map the claimed order processing system to Report Writer Process 3102 or some component of thereof. Claim 27 recites that “said order processing system comprises a complex object.” As will be clear from the drawing supplied below, *Bowman*’s “report status table” containing “report status,” which the Office Action maps to the recited “asset table” (lower left) allegedly containing the complex object, is clearly not contained within report writer process 3102 (upper right).

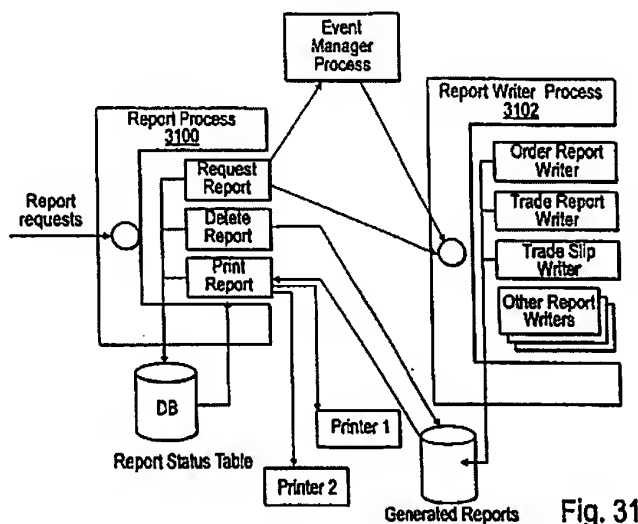


Fig. 31

Thus, the decision of the Office Action to map the recited complex object to the report status and to map the recited asset table to the report status table directly necessitates that *Bowman* cannot anticipate the limitation that “said order processing system comprises a complex object.” For at least this reason, Applicants respectfully submit that *Bowman* does not anticipate Claim 27.

Additionally, the Office Action fails to demonstrate that *Bowman* discloses anything even remotely comparable to the claimed “data manager configured to: receive at least a portion of the service profile from an external server via an information network, and generate a business object based on the portion of the service profile” as recited in independent Claim 27. The Office Action asserts that *Bowman* teaches “a data manager configured to receive at least a portion of the service profile from an external server via an information network (Fig. 31, 3100, *Bowman*), and generate a business object based on the portion of the service profile (Fig. 31, ‘Generated reports’.” This mapping is rendered invalid because of an inescapable internal inconsistency. The data manager is recited as performing two functions. *See* Claim 27. The latter function is recited in Claim 27 as “generate a business object based on the portion of the service profile.” Report generation is shown by Figure 31 (above) as occurring in Report Writer Process 3102. Report generation in Report Writer Process 3102 directly contradicts the Office Action’s mapping of the data manager to Report Process 3100. Thus, the Office Action’s alleged data manager (3100) is not configured to “generate a business object based on the portion of the service profile.”

Applicants respectfully submit that *Bowman* does not support a *prima facie* case of anticipation of Claim 27 by teaching each limitation of independent Claim 27; Claim 27 is therefore allowable over *Bowman*. Applicants thus respectfully urge the Examiner

withdraw the § 102 rejection of Claim 27. Applicants further respectfully submit that dependent claims 28-49 are allowable as depending upon allowable base claims in addition to being allowable for various other reasons. Applicants therefore respectfully request that the Examiner withdraw the rejections of each of Claims 27-49 and issue an indication of the allowability of all pending claims.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stephen A. Mason', written over a horizontal line.

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